

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

Accusation Number _____

ACCUSATION

STATE OF NEW JERSEY)

v.)

TYRONE DUDLEY)

TYRONE DUDLEY, being charged upon oath with one count of Conspiracy contrary to N.J.S.A. 2C:5-2, having in writing waived indictment and trial by jury and having requested to be tried before this Court, and said request having been granted;

Supervising Deputy Attorney General Mark G. Eliades of the Division of Criminal Justice, for the State of New Jersey, alleges that:

COUNT ONE

(Conspiracy - Third Degree)

TYRONE DUDLEY

and other individuals whose identities are known to the State, who are coconspirators but not named as defendants within this Accusation, between in or about December 2002, and in or about March 2004, at the City of Newark, in the County of Essex,

elsewhere and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of official misconduct, theft, tampering with public records or information, and falsifying records, did agree together that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

B. One or more of them knowingly would aid in the planning, solicitation or commission of said crimes, that is:

1. Official Misconduct, in that one or more of them, acting in the capacity of a public servant, would purposely commit an unauthorized act relating to their office for the benefit of themselves or another and/or to injure or deprive another of a benefit, that is, the said TYRONE DUDLEY, a public servant sworn law enforcement officer of the Newark Police Department or others police officers of the City of Newark, purposefully and knowingly would commit acts of unlawful theft, unlawful search and seizure, and would prepare and file false police reports in an effort to conceal such unlawful conduct in violation of N.J.S.A. 2C:30-2;

2. Theft, in that one or more of them, would knowingly and unlawfully take or exercise unlawful control over movable property of another namely, United States currency having an aggregate value in excess of \$500, and/or which was taken from the person of individuals whose names are known to the State,

with the purpose to deprive said individuals thereof, contrary to the provisions of N.J.S.A. 2C:20-3;

3. Tampering with Public Records or Information, in that, one or more of them, with the purpose to defraud or injure would make, present, offer for filing, or use, a record, document, or thing, knowing it to be false and with the purpose it be taken as a genuine part of the information or records received or kept by government, that is, one or more of them would make, present, offer for filing, or use official City of Newark Police Department reports, knowing said documents to contain false information with the purpose that said documents be taken as a genuine part of the information or record kept by government, in violation of N.J.S.A. 2C:28-7; and

4. Falsifying Records, in that one or more of them, with the purpose to deceive or injure the State of New Jersey and others, would knowingly falsify official City of Newark Police Department reports, and utter said writings knowing they contained false statements or information, in violation of N.J.S.A. 2C:21-4.

OVERT ACT

The State of New Jersey, through Supervising Deputy Attorney General Mark G. Eliades of the Division of Criminal Justice, further alleges that in pursuance of the said conspiracy, the following Overt Act, among others was committed:

1. On or about February 8, 2004, at the City of Newark, in the County of Essex, TYRONE DUDLEY and other Newark Police Officers whose identities are known to the State, who are coconspirators but not named as defendants within this Accusation, did unlawfully enter and unlawfully search an apartment located at 530A South 19th Street and did further knowingly submit and file official Newark Police Department reports containing false information regarding their actions that day.

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

Mark G. Eliades
Supervising Deputy Attorney General
Division of Criminal Justice